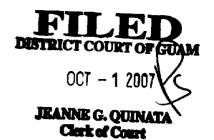
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Attorneys for Defendant LeoPalace Resort

## IN THE DISTRICT COURT OF GUAM

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,  Plaintiff,  vs.	) CASE NO. 1:06-CV-00028 ) ) ) )
LEO PALACE RESORT,	)
Defendant.	) ) SUPPLEMENTAL DECLARATION OF ) TIM ROBERTS IN SUPPORT OF MOTION
JENNIFER HOLBROOK, VIVIENE VILLANUEVA and ROSEMARIE TAIMANGLO,	) FOR PARTIAL SUMMARY JUDGMENT ) )
Plaintiff-Intervenors, vs.	) ) )
MDI GUAM CORPORATION dba LEO PALACE RESORT MANENGGON HILLS and DOES 1 through 10,	) ) )
Defendants.	) ) )

- I, Tim Roberts, declare under penalty of perjury as follows:
- 1. I am the attorney for Defendant LeoPalace Resort. I have personal knowledge of the matters stated herein, and if called, I could and would testify truthfully thereto.

- 2. Attached as Exhibit A1 through A3 to a separate declaration I have delivered to counsel for the other parties in this case is a true and correct copy of excerpts of Rose Taimanglo's psychotherapy records obtained from Dr. Lilli Perez-Iyechad.
- Attached hereto as Exhibit B1-B6 to a separate declaration I have delivered 3. to counsel for the other parties in this case is a true and correct copy of excerpts of Jennifer Holbrook's psychotherapy records obtained from Dr. Lilli Perez-Iyechad and Tom Babauta.

Under penalty of perjury I declare that the foregoing is true and correct.

Executed this 1st day of October, 2007 in Tamuning, Guam.

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